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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
x
JACOB SILBERSTEIN, on behalf of
himself and all others similarly
situated,

Plaintiff,

-against-

ANSWER

15-cv-8727

RESORT RECOVERY SOLUTIONS, LLC, a California limited liability company; and JOHN DOES 1 TO 10,

Defendants.

-----x

Defendant RESORT RECOVERY SOLUTIONS, LLC, by its attorneys, Barron & Newburger, P.C. answers plaintiff's complaint as follows:

- Defendant acknowledges being sued pursuant to Federal and State law, but denies any violation thereof.
- Defendant denies each and every allegation contained in paragraph "2" of the complaint.
- This paragraph contains no factual allegations directed against the defendant and does not require an admission or denial.
- 4. This paragraph contains no factual allegations directed against the answering defendant and requires no admissions or denials.
- This paragraph contains no factual allegations directed against the answering defendant and requires no admissions or denials.

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- 6. This paragraph contains no factual allegations directed against the answering defendant and requires no admissions or denials.
- 7. This paragraph contains no factual allegations directed against the answering defendant and requires no admissions or denials.
- Defendant acknowledge being sued pursuant to Federal and State law, but denies any violation thereof.
- 9. Defendant admits the allegations contained paragraph "9" of the complaint.
- 10. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "10" of the complaint.
- 11. Defendant admits the allegations contained in paragraph "11" of the complaint.
- 12. Defendant denies each and every allegation contained in paragraph "12" of the complaint.
- 13. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "13" of the complaint.
- 14. Defendant admits the allegations contained in paragraph "14" of the complaint.
- 15. Defendant denies each and every allegation contained in paragraph "15" of the complaint.

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- 16. Defendant denies each and every allegation contained in paragraph "16" of the complaint.
- 17. Defendant admits the allegations contained in paragraph "17" of the complaint.
- 18. Defendant admits the allegations contained in paragraph "18" of the complaint.
- 19. Defendant admits the allegations contained in paragraph "19" of the complaint.
- 20. Defendant admits the allegations contained in paragraph "20" of the complaint.
- 21. Defendant admits the allegations contained in paragraph "21" of the complaint.
- 22. Defendant admits the allegations contained in paragraph "22" of the complaint.
- 23. Defendant admits the allegations contained in paragraph "23" of the complaint.
- 24. Defendant admits the allegations contained in paragraph "24" of the complaint.
- 25. Defendant admits the allegations contained in paragraph "25" of the complaint.
- 26. Defendant admits the allegations contained in paragraph "26" of the complaint.

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- 27. Defendant admits the allegations contained in paragraph "27" of the complaint.
- 28. Defendant admits the allegations contained in paragraph "28" of the complaint.
- 29. Defendant admits the allegations contained in paragraph "29" of the complaint.
- 30. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "30" of the complaint.
- 31. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "31" of the complaint.
- 32. Defendant denies each and every allegation contained in paragraph "32" of the complaint.
- 33. Defendant denies each and every allegation contained in paragraph "33" of the complaint.
- 34. Defendant denies each and every allegation contained in paragraph "34" of the complaint.
- 35. Defendant denies each and every allegation contained in paragraph "35" of the complaint.
- 36. Defendant denies each and every allegation contained in paragraph "36" of the complaint.

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- 37. Defendant denies each and every allegation contained in paragraph "37" of the complaint..
- 38. Defendant denies each and every allegation contained in paragraph "38" of the complaint..
- 39. Defendant denies each and every allegation contained in paragraph "39" of the complaint.
- 40. Defendant denies each and every allegation contained in paragraph "40" of the complaint.
- 41. Defendant denies each and every allegation contained in paragraph "41" of the complaint.
- 42. Defendant denies each and every allegation contained in paragraph "42" of the complaint.
- 43. Defendant denies each and every allegation contained in paragraph "43" of the complaint.
- 44. Defendant repeats and realleges its previous admission and denials contained in paragraph "1" through "43" of this complaint.
- 45. Defendant admits the allegations contained in paragraph "45" of the complaint.
- 46. Defendant admits the allegations contained in paragraph "46" of the complaint.
- 47. Defendant admits the allegations contained in paragraph "47" of the complaint.

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- 48. Defendant admits the allegations contained in paragraph "48" of the complaint.
- 49. Defendant admits the allegations contained in paragraph "49" of the complaint.
- 50. Defendant admits the allegations contained in paragraph "50" of the complaint.
- 51. Defendant denies each and every allegation contained in paragraph "51" of the complaint.
- 52. Defendant repeats and realleges its previous admission and denials contained in paragraph "1" through "51" of this complaint..
- 53. Defendant denies each and every allegation contained in paragraph "53" of the complaint.
- 54. Defendant denies each and every allegation contained in paragraph "54" of the complaint.
- 55. Defendant denies each and every allegation contained in paragraph "55" of the complaint.
- 56. Defendant denies each and every allegation contained in paragraph "56" of the complaint.
- 57. Defendant denies each and every allegation contained in paragraph "57" of the complaint.
- 58. Defendant denies each and every allegation contained in paragraph "58" of the complaint.

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- 59. Defendant denies each and every allegation contained in paragraph "59" of the complaint.
- 60. Defendant denies each and every allegation contained in paragraph "60" of the complaint.
- 61. Defendant admits the allegations contained in paragraph "61" of the complaint.
- 62. Defendant denies each and every allegation contained in paragraph "62" of the complaint.
- 63. Defendant denies each and every allegation contained in paragraph "63" of the complaint.
- 64. Defendant denies each and every allegation contained in paragraph "64" of the complaint.

WHEREFORE, defendant complaint be dismissed.

Dated: New City, NY
January 13, 2016

WHEREFORE, defendant respectfully requests that plaintiff's

ARTHUR SANDERS, ESQ.

BARRON & NEWBURGER, P.C.

Attorney for defendant

Resort Recovery Solutions, LLC

30 South Main Street

New City, NY 10956

845-499-2990

TO:

ABRAHAM KLEINMAN, ESQ. KLEINMAN LLC Attorney for plaintiff 626 RXR Plaza Uniondale, NY 11556